

**Stephen Manning** (SBN 013373)

stephen@innovationlawlab.org

**Nadia Dahab** (SBN 125630)

nadia@innovationlawlab.org

INNOVATION LAW LAB

333 SW Fifth Avenue #200

Portland, OR 97204

Telephone: +1 503 241-0035

Facsimile: +1 503 241-7733

**Karen C. Tumlin** (admitted *pro hac vice*)

karen.tumlin@justiceactioncenter.org

**Esther H. Sung** (admitted *pro hac vice*)

esther.sung@justiceactioncenter.org

JUSTICE ACTION CENTER

P.O. Box 27280

Los Angeles, CA 90027

Telephone: +1 323 316-0944

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

JOHN DOE #1; JUAN RAMON MORALES;  
JANE DOE #2; JANE DOE #3; IRIS  
ANGELINA CASTRO; BLAKE DOE;  
BRENDA VILLARRUEL; and LATINO  
NETWORK,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; KEVIN MCALEENAN, in his  
official capacity as Acting Secretary of the  
Department of Homeland Security; U.S.  
DEPARTMENT OF HEALTH AND  
HUMAN SERVICES; ALEX M. AZAR II, in  
his official capacity as Secretary of the  
Department of Health and Human Services;  
U.S. DEPARTMENT OF STATE;  
MICHAEL POMPEO, in his official capacity  
as Secretary of State; and UNITED STATES  
OF AMERICA,

Defendants.

Case No.: 3:19-cv-01743-SB

**DECLARATION OF IRIS ANGELINA  
CASTRO IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION**

**Declaration of Iris Angelina Castro**

I, Iris Angelina Castro, upon my personal knowledge, hereby declare as follows:

1. I am a United States citizen.
2. I currently live in Springfield, Massachusetts with my U.S. citizen son. I recently became unemployed.
3. I currently have state health insurance. I have MassHealth subsidized insurance and also RMC Healthnet Plan Mercy Alliance.
4. I have sponsored an immigrant visa application(s) for my husband, [REDACTED] [REDACTED] so that I can reunite with him here.
5. My husband is a national of the Dominican Republic and currently resides there. He has never been to the United States and therefore did not require a waiver.
6. I married my husband in the Dominican Republic on May 24, 2018.
7. I applied for my husband to come to the United States on November 14, 2018. The Form I-130 was approved on May 30, 2019.
8. Since then, I am in the process of filing all of the necessary documents with the NVC so that we can be scheduled for an interview. The consulate in the Dominican Republic is pretty quick to schedule an interview once they have received all of the necessary documentation. I hope to submit everything to the NVC within the next two weeks.
9. Recently I received news of the October 4 Presidential Proclamation detailing the ban on their entry unless my husband will be covered by approved health insurance within 30 days of the alien's entry into the United States, or unless the alien possesses the financial resources to pay for reasonably foreseeable medical costs.
10. This news is devastating because I am currently unemployed. Several weeks ago I was employed as a teacher; however, my son became very ill and I was required to stay home with him. I was forced to quit my job and I lost all of my benefits. Because I am unable to work, I have no source of income and no money to be able to show that we can afford private health insurance for my husband.

11. When I heard of the news of the new regulation, I made attempts to contact various private insurance agencies. I was quoted \$248 a month for basic coverage. However, my husband would still need to pay approximately 40% of the cost for each doctor's visits. This plan was not for full coverage. Even at a price of \$248.00 a month, I still cannot afford this insurance because I do not have a source of income. I also cannot afford visitor insurance or short term disability plans and we are not eligible for other plans such as Medicare, Tricare. There is nothing we can do to fall within the Proclamation.
12. I also need my husband here with me to alleviate my current financial situation and assist with my pregnancy. It's not right to live as a separated family and my child will suffer harm that can never be undone if my husband remains separated from us. My husband could work if he entered the United States with his green card.
13. I feel lost and overwhelmed. I need my husband in the United States to work so that I can stay home and care for our children. Unfortunately, without him, I am forced to have to use public benefits as my only way to survive. If he were allowed to come to the United States, my financial crisis would be significantly alleviated and we have the ability to live without the need for benefits and public assistance one day.
14. This is a time in which my husband and I should be celebrating our marriage and the birth of our daughter but instead we are being forced to live apart. Our lives are on hold.
15. I am willing to serve as a class representative on behalf of those who are similarly situated to me and cannot have family members join them in the United States because of the current restrictions.
16. I know that if the class is certified I will be representing more than just myself in this case. I have spoken with the lawyers who represent me about what being a class representative means. I want to help everyone in my situation because we are all suffering due to the unfair restrictions on admissions imposed by this Administration.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at \_\_\_\_\_ on November 4, 2019.

Iris A. Castro

Iris Angelina Castro